

## DEFENDANTS' DISCOVERY DESIGNATIONS

## TO BE READ IN COURT

Defendants' Discovery Designation	Plaintiffs' Objection	Defendants' Response
Plaintiff Larry Bowoto's Responses to Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 23	<p>1. Plaintiffs object to the inclusion of any reference to Sunday Johnbull Irowarinun since he is not a plaintiff in this trial.</p> <p>2. Plaintiff objects to the extent this Request for Admission suggests that only members of the Concerned Iaje Citizens went to the Parabe Platform to protest; representatives of the 42 affected communities, and not just members of the CIC, went to the Parabe Platform to protest.</p> <p>3. Plaintiffs object that the defendants should not be permitted to put these answers in twice, once in the form of RFAs propounded to Bowoto, and a second time in RFAs propounded to Jeje.</p>	<p>1. Defendants do not intend to read the preface that mentions Sunday Johnbull Irowarinun.</p> <p>2. Plaintiff Bowoto addresses his own objection by qualifying his response to the admission.</p> <p>3. Plaintiff Bowoto's response to Request No. 23 differs from plaintiff Jeje's response, so the cumulative objection lacks merit. Also, both plaintiffs' admissions are relevant, and defendants have the right to offer each to the jury.</p>
Plaintiff Larry Bowoto's Responses to Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 24	<p>1. Plaintiffs object to the inclusion of any reference to Sunday Johnbull Irowarinun since he is not a plaintiff in this trial.</p> <p>2. Plaintiff objects to the extent this Request for Admission suggests that only members of the Concerned Iaje Citizens went to the Parabe Platform to protest; representatives of the 42 affected</p>	<p>1. Defendants do not intend to read the preface that mentions Sunday Johnbull Irowarinun.</p> <p>2. Defendants are entitled to introduce this admission relating to the CIC. If plaintiffs want to argue that the jury should not give it weight, they are entitled to do so.</p>

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	communities, and not just members of the CIC, went to the Parade Platform to protest.  3. Plaintiffs object that the defendants should not be permitted to put these answers in twice, once in the form of RFAs propounded to Bowoto, and a second time in RFAs propounded to Jeje.	3. Plaintiff Bowoto's response to Request No. 24 differs from plaintiff Jeje's response, so the cumulative objection lacks merit. Also, both plaintiffs' admissions are relevant, and defendants are entitled to offer each to the jury.
Plaintiff Larry Bowoto's Responses to Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 43	Plaintiffs object that the defendants should not be permitted to put these answers in twice, once in the form of RFAs propounded to Bowoto, and a second time in RFAs propounded to Jeje.	Both plaintiffs' admissions are relevant, and defendants are entitled to offer each to the jury.
Plaintiff Bassey Jeje's Responses to Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 23	1. Plaintiffs object to the inclusion of any reference to Sunday Johnbull Irowarinun since he is not a plaintiff in this trial.  2. Plaintiff objects to the extent this Request for Admission suggests that only members of the Concerned Ilaye Citizens went to the Parade Platform to protest; representatives of the 42 affected communities, and not just members of the CIC, went to the Parade Platform to	1. Defendants do not intend to read the preface that mentions Sunday Johnbull Irowarinun.  2. Plaintiff Jeje addresses his own objection by qualifying his response to the admission.  3. Plaintiff Jeje's response to Request No.

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	<p>protest.</p> <p>3. Plaintiffs object that the defendants should not be permitted to put these answers in twice, once in the form of RFAs propounded to Bowoto, and a second time in RFAs propounded to Jeje.</p>	<p>23 differs from plaintiff Bowoto's response, so the cumulative objection lacks merit. Also, both plaintiffs' admissions are relevant, and defendants are entitled to offer each to the jury.</p>
<p>Plaintiff Bassey Jeje's Responses to Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 24</p>	<p>1. Plaintiffs object to the inclusion of any reference to Sunday Johnbull Irowarinnu since he is not a plaintiff in this trial.</p> <p>2. Plaintiff objects to the extent this Request for Admission suggests that only members of the Concerned Iaje Citizens went to the Parabe Platform to protest; representatives of the 42 affected communities, and not just members of the CIC, went to the Parabe Platform to protest.</p> <p>3. Plaintiffs object that the defendants should not be permitted to put these answers in twice, once in the form of RFAs propounded to Bowoto, and a second time in RFAs propounded to Jeje.</p>	<p>1. Defendants do not intend to read the preface that mentions Sunday Johnbull Irowarinnu.</p> <p>2. Defendants are entitled to introduce this admission relating to the CIC. If plaintiffs want to argue that the jury should not give it weight, they are entitled to do so.</p> <p>3. Plaintiff Jeje's response to Request No. 24 differs from plaintiff Bowoto's response, so the cumulative objection lacks merit. Also, both plaintiffs' admissions are relevant, and defendants are entitled to offer each to the jury.</p>
Plaintiff Bassey Jeje's Responses to	Plaintiffs object that the defendants should	Both plaintiffs' admissions are relevant,

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<b>Defendants' Discovery Designation</b>	<b>Plaintiffs' Objection</b>	<b>Defendants' Response</b>
Defendants' Requests for Admission Pursuant to Court Order Dated 4/18/05, Request Nos. 43	not be permitted to put these answers in twice, once in the form of RFAs, propounded to Bowoto, and a second time in RFAs propounded to Jeje.	and defendants are entitled to offer each to the jury.

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